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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

HERB HALLMAN CHEVROLET, INC.,  
D.B.A. CHAMPION CHEVROLET,

Case No. 3:22-CV-00447-MMD-CLB

**Plaintiff,**

vs.  
GENERAL MOTORS LLC,  
Defendant

**ORDER GRANTING PLAINTIFF'S  
CORRECTED UNOPPOSED  
MOTION FOR EXTENSION OF  
TIME TO RESPOND TO  
DEFENDANT'S MOTION FOR  
SUMMARY JUDGMENT  
(FIRST REQUEST)**

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), and Local Rules IA 6-1(a) and IA 6-2, Plaintiff Herb Hallman Chevrolet, Inc., d/b/a Champion Chevrolet ("Plaintiff"

1 or "Champion"), hereby files this Unopposed Corrected<sup>1</sup> Motion for Extension of Time  
2 to Respond to Defendant's Motion for Summary Judgment (ECF No. 68), filed by  
3 Defendant, General Motors, LLC ("Defendant" or "GM") on September 9, 2024. This is  
4 the first request for an extension of this deadline. In support thereof, Plaintiff states as  
5 follows:

6       1. On September 9, 2024, Defendant filed its Motion for Summary Judgment  
7 (ECF No. 68).

8       2. Plaintiff's response to the same is presently due on September 30, 2024.

9       3. As of the filing of the instant Motion, a dangerous weather system has  
10 developed in the Gulf of Mexico.

11      4. The weather system is expected to develop into Hurricane Helene and  
12 make landfall in the Big Bend region of Florida's panhandle—where counsel for Plaintiff  
13 is located—between late Thursday, September 26, 2024 and Friday, September 27, 2024.

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20       <sup>1</sup> Plaintiff's Original motion for extension, filed on September 24, 2024 (ECF No. 69), was granted  
21 (*see* ECF No. 70); however, the original motion contained scrivener's errors concerning: (1) the dates of  
22 then-impending Hurricane Helene and (2) the date upon which the one (1) week extension was to fall.  
23 Plaintiff counsel's Tallahassee, FL office was scheduled to be closed on Thursday, September 26 through  
24 Friday, September 27, 2024; and, instead of October 4, 2024, the actual date for the extended deadline for  
25 Plaintiff to file its response to Defendant's Motion for Summary Judgment (as consented to by Defendant  
on September 23, 2024) is Monday October 7, 2024. Accordingly, Plaintiff files the instant Corrected  
Unopposed Motion for Extension of Time to Respond, which corrects only the office closure dates provided  
in ¶¶ 4,5 of the Original motion, and the date upon which Plaintiff's response is due. No other substantive  
amendments have been made, and this motion still aligns with what the parties consented to, which is a  
one-week extension of time in light of Hurricane Helene.

5. In preparation for Helene's impending landfall, Plaintiff's counsel's Tallahassee, Florida office will likely be closed from at least Thursday, September 26, 2024 through Friday, September 27, 2024.

6. As such, Plaintiff respectfully requests that this Honorable Court enter an order extending Plaintiff's deadline to respond to Defendant's Motion for Summary Judgment by one (1) week.

7. In accordance with Federal Rule of Civil Procedure 6(b)(1)(A) and LR IA 6-1(a), Plaintiff submits that good cause exists to extend the deadline to respond.

8. Such request is not made for the purposes of delay; this is Plaintiff's first request for an extension of this deadline; and no other deadlines in the case schedule will be disturbed by granting such relief.

WHEREFORE, Plaintiff requests that the Court extend the time until **October 7, 2024**, for Plaintiff to respond to GM's Motion for Summary Judgment.

## LOCAL RULE IA-3 DECLARATION OF CONFERRAL

The undersigned conferred with counsel for Defendant regarding the requested extension via electronic mail on September 23, 2024. On the same day, counsel for GM advised that GM consents to a one-week extension of Plaintiff's deadline to respond to GM's Motion for Summary Judgment.

Respectfully Submitted,

/s/Nicholas A. Bader  
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IT IS SO ORDERED.

## ORDER

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**UNITED STATES DISTRICT JUDGE**

DATED: October 2, 2024

## **CERTIFICATE OF SERVICE**

I certify that a true copy of the above was filed using the Court's CM/ECF system and thus served upon counsel for each party on October 2, 2024

/s/Nicholas A. Bader  
Nicholas A. Bader